

PAULA T. DOW
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: Elaine C. Schwartz
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

| | | |
|---------------------------|---|---|
| _____ | : | |
| PAMELA WINROW ISLAM | : | |
| | : | Case No. 08-cv-01844 (JBS-AMD) |
| Plaintiff | : | |
| | : | |
| | : | <u>CIVIL ACTION</u> |
| v. | : | |
| | : | NOTICE OF MOTION TO DISMISS |
| | : | PLAINTIFF'S COMPLAINT FOR FAILURE TO |
| CITY OF BRIDGETON ET ALS. | : | RESPOND TO DISCOVERY REQUESTS, |
| | : | INITIAL DISCLOSURES AND COURT'S |
| | : | SPECIFIC DIRECTION PURSUANT TO |
| Defendants | : | <u>Fed. R. Civ. P. 41(a)(2)(b)</u> |
| _____ | : | |

To: To
All Persons Listed on the Certification of Service

PLEASE TAKE NOTICE that, at a date and time determined by the court, the undersigned counsel for the Defendant, Douglas VanSant will move before the United States District Court for the District of New Jersey, in accordance with Fed. R. Civ. P. 41(a)(2)(b) and the Local Civil Rules of this Court for an order Dismissing Plaintiff's Complaint for Failure to Respond to

Discovery Requests, Initial Disclosures and Court's Specific Direction Pursuant to Fed. R. Civ. P. 41(a)(2)(B).

PLEASE TAKE FURTHER NOTICE that Defendant VanSant will rely upon the attached brief in support of his motion, as well as the pleadings, prior motion papers and orders on file in this action.

This matter has not been scheduled for trial.

A proposed form of order is attached.

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Dated: February 8, 2010

CERTIFICATION OF SERVICE

I hereby certify that on February 8, 2010, Defendant VanSant's Motion to Dismiss Plaintiff's Complaint for Failure to Respond to Discovery Requests, Initial Disclosures and Court's Specific Direction Pursuant to Fed. R. Civ. P. 41(a)(2)(B) and supporting papers were electronically served by CM/ECF upon the following counsel of record:

Lilia Londar, Esq.
William H. Buckman Law Firm
110 Marter Ave.; Suite 209
Moorestown, NJ 08057
Attorney for plaintiff

Robert V. Fodera, Esq.
Gebhardt & Kiefer
1318 Route 31
Po Box 4001
Clinton, NJ 08809-4001
Attorney for Defendant Shrader and City of Bridgeton

and, a courtesy copy was served, via overnight mail, on the

Honorable Jerome B. Simandle, U.S.J.
Mitchell H. Cohen U.S. Courthouse
Room 6010
1 John F. Gerry Plaza
P.O. Box 888
Camden, New Jersey 08101

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Dated: February 8, 2010